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AT 8:30__________M
WILLIAM T. WALSH
CLERK

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JACQUELYN REAVES, THE PLAINTIFF V., MONMOUTH COUNTY PROSECUTOR'S OFFICE; McELROY, MULVANEY, DEUTSCH &CARPENTER, LLP; MONMOUTH UNIVERSITY; MONMOUTH MEDICAL CENTER; NEPTUNE CITY POLICE; KEITH MITCHELL; JOANNE JODRY; MELANIE LIPOMANIS; JOHN PERIANO, GREY J. DIMENNA; TRENTON PSYCH; THOMAS J. SCULLY, THE DEFENDANT(S)	Case No.: *Civil Action* **VERIFIED FIRST COMPLAINT**

Plaintiff Jacquelyn Reaves, for her Complaint against the Defendants Monmouth County Prosecutor's Office, McElroy, Mulvaey, Deutsch&Carpenter, LLP., Monmouth Medical Center, Neptune City Police, Keith Mitchell, Joanne Jodry, Melanie Lipomanis, John Periano, Grey J. Dimenna, Trenton Psych, and Thomas J. Scully, states as follows:

PRELIMINARY STATEMENT

1. This case arises out of illegal, deliberate, and conspiratory actions perpetrated by Defendants against Plaintiff, which caused a violation on Plaintiff's rights, law, and damage, predicted through retaliation, discrimination, and libel slander.
2. Defendants criminal, sadist, sinister, and deliberated retaliation against Plaintiff ultimately led to her wrongful abduction (kidnapping), and torture contrary to State and Federal Law, public policy, and ethical professional standards aligned with the Constitution, and governed by each state.
3. Plaintiff complains pursuant to 42 U.S.C.1981, Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. 2000e to 2000e-17 (amended in 1972, 1978, and by the Civil Rights Act of 1991, Pub. L. No 102-166) ("Title VII"), 42 U.S.C. 1983, 42 U.S.C. 1985(2), 42 U.S.C 1986, 42 U.S.C. 1987, 42 U.S.C. 1983, 42 U.S.C. 1985(2), 42 U.S.C 1986, 42 U.S.C. 1987, Kidnapping N.J.S.A 2C:13-1, Harassment N.J.S.A 2C:33-4, Official Misconduct N.J.S.A 2C:30-2, Retaliation N.J.S.A 2C:27-5, and seeks damages to redress the injuries she has suffered as a result of being

abducted (kidnapped), tortured, discriminated against, retaliated against, and harassed solely due to her race, ethnicity, and/or gender.

JURISDICTION AND VENUE

4. This Court has jurisdiction over this controversy pursuant of 28 U.S.C. 1331, 1337, and 1343.
5. This Court has supplemental jurisdiction over Plaintiff's claims brought under state law pursuant to 1376.
6. Venue is proper to 28 U.S.C.1391(b), as a substantial part of the events or omissions giving rise to the claims occurred in this judicial district.

THE PARTIES

7. Plaintiff Jacquelyn Reaves (hereinafter, "Plaintiff") is an individual residing in the State of New Orleans, Louisiana, in Orleans Parish.
8. Upon information and belief, Defendant Monmouth County Prosecutor's Office (hereinafter, " Monmouth county prosecutor's office") is an entity, entrusted to maintain civil order in Monmouth County.
9. Upon information and belief, Defendant McElroy, Mulvaney, Deutsch&Carpenter, LLP., (hereinafter "McElroy, Mulvaney, Deutsch&Carpenter") is an entity, licensed to conduct business in the State of New Jersey, with a location of 1300 Mount Kemble Avenue, Morristown, New Jersey 07901.
10. Upon information and belief, Defendant Monmouth medical center (hereinafter, "Monmouth medical") is a facility, licensed to conduct business in the State of New Jersey, with a location of 300 Second Avenue, Long Branch, New Jersey 07740.
11. Upon information and belief Defendant Neptune City Police (hereinafter, "Neptune city police") is an entity, entrusted to maintain civil order in Neptune, New Jersey, with a location of 106 West Sylvania Avenue, Neptune, New Jersey 07735.
12. Upon information and belief, Defendant Trenton Psych (hereinafter, "Trenton") is a facility, licensed to conduct business in the State of New Jersey, with a location of Sullivan Way, PO BOX 7500. West Trenton, New Jersey 08628.
13. Upon information and belief Defendant Keith Mitchell (hereinafter, "Mitchell") is an individual residing in the State of New Jersey, County of Monmouth.
14. Upon information and belief Defendant Joanne Jodry (hereinafter, "Jodry") is an individual residing in the State of New Jersey, County of Monmouth.
15. Upon information and belief Defendant Melanie Lipomanis (hereinafter, "Lipomanis") is an individual residing in the State of New Jersey, County of Morris.
16. Upon information and belief Defendant John Periano (hereinafter, "Periano") is an individual residing in the State of New Jersey, County of Morris.
17. Upon information and belief Defendant Grey J. Dimenna (hereinafter, "Dimenna") is an individual residing in the State of New Jersey, County of Monmouth.
18. Upon information and belief Defendant Thomas J. Scully (hereinafter, "Scully") is an individual residing in the State of New Jersey, County of Morris.
19. Venue is proper in this Court because (1) parties transact business in Monmouth County; and (2) the acts and circumstances upon which Plaintiff's claims are based arose and/or occurred in Monmouth County.

FACTUALY ALLEGATIONS COMMON TO ALL COUNTS

20. Plaintiff started her Graduate education at Monmouth university in January 2011 in the Licensed Mental Health Counselor program at Monmouth university, in the psychology department.

21. Plaintiff transferred out of the university in August of 2012 after suffering mental and emotional pain from an incident of Institutional racism by SuzanneFico, an adjunct at the school, against the Plaintiff.
22. Plaintiff was in communication with former president of the college Paul Gaffney requesting a refund in the Spirit of Justice, all of which lead to Mr. Gaffney retiring the day after he refused Plaintiff's rightful request.
23. On February 20th, 2014, Plaintiff filed a lawsuit against Suzanne Fico in Monmouth County Superior Court, for malpractice to formally address the Institutional racism.
24. The matter was being managed by Defendant Judge Scully.
25. Sometime after also in 2014, Plaintiff made several professional valuations regarding her career direction, and her graduate school credits, and reapplied to Monmouth university.
26. In August 2014, Plaintiff was accepted to Monmouth university into the Psychological Counseling program, within graduate school's department of Psychology, with the prospective graduation May 2015.
27. Plaintiff was attending graduate school, living in off-campus housing at Monmouth university, prosecuting the civil malpractice complaint on against Suzanne Fico (at 33 years old).
28. George Kapalka, Defendant Jodry, and Defendant Dimenna knew about Plaintiff's exceptional professional work; she is also compassionate, highly skilled, and educated.
29. Monmouth university, the office of the general counsel, and George Kapalka, and Defendant Jodry also knew Plaintiff's malpractice suit filed against Suzanne Fico for Institutional racism.
30. Defendant Jodry deliberately lied to Defendant Mitchell and committed perjury to facilitate Plaintiff's torture at Monmouth medical by people she knew at Monmouth medical.

RETALIATION AND EVENTS LEADING UP TO CRIME AGAINST PLAINTIFF

31. On August 7th, 2014, George Kapalka emailed Plaintiff, and copied Joanne Jodry, Stephanie Hall, and Gary Handler, Ms. Reaves, "It is unlikely you will be able to graduate after the Fall semester" (sic.).
32. George Kapalka was rude, and obnoxious to Plaintiff, and obsessively and illegally tampered with her personal information throughout the semester.
33. George Kapalka would also frequently send Plaintiff emails requesting her to meet with him, and threatened her graduation when they spoke.
34. On August 20th, 2014, Plaintiff served Suzanne Fico the malpractice complaint by way of Monmouth County sheriff's department.
35. On or about September 24th, 2014, Suzanne Fico defaulted on the malpractice complaint.
36. Suzanne Fico was not properly insured with liability insurance which is a requisite within the profession of psychology, and family and marriage therapy in the State of New Jersey.
37. Plaintiff was contacted by Defendant Lipomanis, and Defendant Periano, and she was informed they were retained to represent Suzanne Fico.
38. McElroy, Deutsch, Mulvaney&Carpenter, is not the attorney firm that represents Suzanne Fico's insurance company, since Suzanne was not properly insured in the State of New Jersey.
39. On or about October 20th, 2014, Plaintiff received a letter from Defendant Periano, on behalf of his attorney firm, and threatened Plaintiff that he "will pursue all available avenues of recourse" (sic.), if Plaintiff did not drop the malpractice complaint in the civil law division against Suzanne Fico.
40. Plaintiff was being harassed and bullied the entire semester by Defendant Jodry, George Kapalka, the office of the general counsel, Defendant Dimenna.
41. Defendant Jodry sent Plaintiff several strange, annoying, harassing, and inappropriate emails to Plaintiff suggesting Plaintiff should "smooze" (sic.) to get over on people, which is illegal in the field of psychology.
42. Plaintiff did not feel comfortable interaction with Defendant Jodry after this admission.

43. Defendant Jodry would often lecture about the stupidity of the police, and the corruption of lawyers, and Judges, which also made Plaintiff feel extremely uncomfortable.
44. Defendant Jodry emailed Plaintiff and asked her to meet up with her after class.
45. Plaintiff declined to meet Defendant Jodry after class.
46. Plaintiff was on a billboard for yoga, she was contacted by a popular television show regarding brand marketing, and earned her Series 6, Series 63, and her Life and Health insurance licenses, when she was a Financial Consultant. Plaintiff also opened a nonprofit organization, was proposed a business acquisition offer, was offered space in her uncle's mini mall to start her own business, and is self-published.
47. Plaintiff also immersed herself in volunteering, and other known philanthropic work.
48. Plaintiff found out Defendant Jodry enrolled her daughter into the school district Plaintiff's mother worked for before Plaintiff's mother retired.
49. There is reason to believe Defendant Jodry was obsessed with Plaintiff's life.
50. George Kapalka threatened Plaintiff's graduation the entire semester for no reason.
51. When Plaintiff rightfully told Kapalka retaliation is illegal, George Kapalka told Plaintiff she no longer had to complete her Graduate Internship to graduate.
52. This harassment and bullying eventually escalated into the office of the general counsel, Kapalka, several teachers in the psychology department, and faculty, illegally accessing and sharing Plaintiff's personal information.
53. On November 4th, 2014, Plaintiff logged the first complaint of harassment against Defendant Jodry, as well as several other complaints to the Psychology department, and Monmouth university after that.
54. Defendant Jodry asked Plaintiff if she voted, if she had any open lawsuits against anyone, and if Plaintiff had been arrested. Defendant Jodry then told Plaintiff all of her clients will be arrested.
55. Defendant Jodry was rather annoying to Plaintiff and also would refer to her as "Jac" in class.
56. On November 11th, 2014, Plaintiff became so distressed by Defendant Jodry's harassment, she properly emailed Defendant Jodry "leave me alone".
57. On November 12th, 2014, Defendant Jodry sent Plaintiff another frivolous email.
58. On November 24th, 2014, Plaintiff sent emailed Defendant Lipomanis Interrogatories to Suzanne Fico.
59. Also on November 24th, 2014, Plaintiff arranged a meeting between herself, and Gary Handler to properly address the harassment by Defendant Joanne against her.
60. That same day, Plaintiff received an email from Gary Handler indicating he spoke to Defendant Jodry, and "she agreed" (sic.) with Gary Handler that Plaintiff could leave class early if she felt uncomfortable with Defendant Jodry's harassment.
61. On December 3rd, 2014, Plaintiff arranged another meeting with Gary Handler to address further harassment. Gary Handler told Plaintiff she could submit her assignments through him, in the absence of attending Defendant Jodry's class.
62. On December 4th, 2014, Plaintiff then received a harassing email from George Kapalka acknowledging Defendant Jodry's harassment against her, unethically deescalating her true and correct complaints of harassment and bullying, thereby putting Plaintiff in an intentionally retaliatory, abusive, and hostile environment.
63. Kapalka, Defendant Jodry, and Gary Handler were deliberate in their harassment against the Plaintiff, and they deliberately did not correct their behavior when the Plaintiff logged genuinely distressed, and emotionally wrought complaints of harassment, bullying, and professional misconduct.
64. On December 6th, 2014, Plaintiff received frivolous email from Stephanie Hall on behalf of Suzanne Fico.
65. On December 7th, Plaintiff emailed the president of the school, Paul Brown, and copied Kapalka, Gary Handler, and Defendant Jodry on the email, to formally complain of the harassment, and bullying against her.

66. On December 7th, 2014, (provided through Defendant Lipomanis's exhibits) George Kapalka forwarded the email complaining of harassment to Defendant Dimenna, and wrote, "Please see below. I hope we can talk soon."(sic.), in the body of the email.
67. On or about December 9th, 2014, Defendant Dimenna emailed Plaintiff and indicated the retaliation against her was deliberate, and he was doing nothing to stop or curtail it.
68. Defendant Dimenna then asked Plaintiff if she would meet with him.
69. Plaintiff refused to meet with Defendant Dimenna.
70. Because of this, Plaintiff included Defendant Dimenna, George Kapalka, Defendant Jodry, and eventually Monmouth university (December 29th, 2014) on the civil malpractice complaint she was prosecuting on her own, since the school failed to address her true and correct complaints of harassment, and bullying against her.
71. On December 23rd, 2014, Plaintiff emailed George Kapalka, Defendant Jodry, Defendant Dimenna, Stephanie Hall, and Paul Brown, of Monmouth university, Interrogatories.
72. Albeit Plaintiff was in communication with the attorney's representing Suzanne Fico in the civil malpractice complaint she was prosecuting on her own, she was not contacted by attorney's representing Monmouth university, George Kapalka, Defendant Jodry, or Defendant Dimenna.
73. There is reason to believe Defendant Dimenna was in possession of pictures, and other published, and non-published Professional work written by the Plaintiff.
74. There is reason to believe Defendant Dimenna was obsessed over Plaintiff.
75. Plaintiff earned favorable grades and completed the requisites for her degree program to earn her Master's degree in Psychological counseling, and enrolled in courses to start her Doctoral work.
76. On January 8th, 2015, Plaintiff filed a police report against Defendant Dimenna, Defendant Jodry, and Kapalka for harassment.
77. On January 10th, and 12th, 2015, Plaintiff emailed Defendant Dimenna, George Kapalka, and Defendant Jodry, a Notice to Produce.
78. Neither Monmouth university, nor attorney's representing Monmouth, Defendant Jodry, or Defendant Dimenna, contacted Plaintiff to curtail harassment and bullying against Plaintiff, and to discuss legal issues.
79. In December 2015, upon review of Plaintiff's legal paperwork, Plaintiff found out McElroy, Mulvaney, Deutsch&Carpenter, were retained by Defendants Monmouth university, Defendant Jodry, and Defendant Dimenna.

DELIBERATE CRIME AND TORTURE

80. On January 13th, 2015, Defendant Jodry acquired a picture of the Plaintiff arm in arm with (the Plaintiff's) her niece, and (the Plaintiff's) her dog.
81. Defendant Mitchell admitted Defendant Jodry took the picture of Plaintiff, and (Plaintiff's) her niece, with (Plaintiff's) her dog,, committed perjury (and libel slander), and lied to him indicating Plaintiff's (4 year old) niece (in the picture) was her 11 year old daughter (the spawn of satan).
82. Defendant Mitchell also admitted Defendant Jodry committed perjury (and libel slander) that Plaintiff had mental issues.
83. Plaintiff is highly skilled, and intelligent, as is of impeccable mental and physical health.
84. Defendant Jodry is not permitted access to privileged health information of graduate students.
85. Defendant Mitchell asked Defendant Jodry if Defendant Jodry was harassing the Plaintiff.
86. Defendant Mitchell failed to question why Defendant Jodry would have a picture of Plaintiff with (Plaintiff's) her niece, and (Plaintiff's) her dog, in the first place.
87. Plaintiff is Cuban, Haitian, Italian, French, and of African descent (with brown skin), and Plaintiff's niece is ethnic, with white skin, and brown hair.
88. Defendant Jodry is obese, looks sickly, her skin is pasty white, and her hair is a processed blonde, frizzy (like a clown), from the late 70's, to early 80's genre.

89. Defendant ("sergeant detective") Mitchell did not question the manner Defendant Jodry ascertained a picture of Plaintiff with (Plaintiff's) her niece, and (Plaintiff's) her dog, nor did Defendant Mitchell question Defendant Jodry regarding the age discrepancy of Plaintiff's four year old niece in the picture, against Defendant Jodry's false claims.
90. Sane, intelligent, and logical people, that possess common sense, and that are trained to (impartially) investigate crimes are supposed to be keen on particularities of appearance, and can tell the likeliness in appearance of family of different races.
91. Sane, intelligent, and logical people, that possess common sense, and that are trained in (impartially) investigating crimes, can tell the difference between a four year old, and an eleven year old (child).
92. Defendant Mitchell is not sane, intelligent, logical, does not possess common sense, and is not intellectually fit to carry a weapon, and conduct (any) investigations in the United States of America.
93. Defendant Mitchell then conducted a bias and racial investigation against the Plaintiff, in the absence of approaching Plaintiff to get the truth.
94. In the absence of approaching, or calling Plaintiff to understand what was truly happening since she was being victimized at Monmouth university, Defendant Mitchell contacted Defendant Dimenna in the office of general counsel, one of Plaintiff's harassers.
95. Defendant Mitchell then conspired with Defendant Dimenna, andCharlene Diana, to attend Plaintiff's meeting with Diana, which was intended to hash out legal an academic issues, since she was being harassed and bullied by several teachers at the school, and Defendant Dimenna, in the office of general counsel, and she did not know what to do to make it stop.
96. Defendant Dimenna and Diana then informed Defendant Mitchell Charlene Diana and Plaintiff had a meeting the morning of January 14th, 2015, even though Plaintiff was informed the meeting between her and Diana would be confidential.
97. Defendant Mitchell admitted he coordinated it with Defendant Dimenna, and Diana, to be present at the meeting between Diana, and Plaintiff.
98. On the morning of January 14th, 2015, Plaintiff received a call from Diana's secretary requesting for Plaintiff to come to Diana's office at 3 pm, instead of the morning,.
99. Diana's secretary escorted Plaintiff to Diana's office, where was cornered by Defendant Mitchell; he forcefully twisted her arms behind her back, and handcuffed Plaintiff in the absence of talking to Plaintiff, or asking her any questions.
100. Defendant Mitchell refused to speak with Plaintiff, and review any of the legal information she brought to the meeting between her and Charlene Diana.
101. Defendant Mitchell did not read Plaintiff her rights.
102. Plaintiff could not understand what was happening, and was scared.
103. The MVR revealed Plaintiff was screaming since she was being kidnapped.
104. Defendant Mitchell transported Plaintiff to Monmouth medical center where she was introduced to Dale Rafiniello, who told Plaintiff Defendants Monmouth university, and Monmouth medical "have a relationship" (sic.).
105. Defendant Mitchell also outlined in his admission statement from his Attorney, Defendant Dimenna, and Diana were illegally accessing and sharing Plaintiff's personal information with Monmouth medical, in the absence of the school addressing her factual complaints of harassment and bullying.
106. Dale Rafaniello then gave the okay, and then she, and a group of men restrained Plaintiff, strapped her to a hospital bed, stripped off her clothes while retrained, injected her with tranquilizers, which made Plaintiff feel as though she was being raped.
107. Amina Chowdhury illegally arranged Plaintiff's intake.
108. Rafaniello and the group of men then redressed Plaintiff while she was restrained and put her into nurses scrubs.
109. When the Plaintiff came to the next morning, she was confused and scared.

110. On January 16th, 2015, Defendant Scully signed Plaintiff's commitment papers, then Judges changed – Judge Bauman was the new assignment Judge for Plaintiff's malpractice complaint she was prosecuting in Court.

111. When Plaintiff called Judge's chambers and spoke to Defendant Scully's law clerk, Defendant Scully's law clerk placed Plaintiff on a long hold, and then told her Defendant Scully told her to contact the County Adjuster.

112. Mr. Robert, hospital staff worker, was mad Ranfaniello and a group of men restrained and bruised Plaintiff, and stripped Plaintiff's clothes off. Mr. Robert tracked down Plaintiff's clothes, and belongings, and Plaintiff's forearms were bruised.

113. In October or November of 2014, Matthew Geller introduced himself to Plaintiff while she was waiting for a bus in Long Branch to go to Freehold.

114. Matthew Geller approached Plaintiff smoking a cigarette, told her he worked in the psychology department across the street at Monmouth medical, and started asking Plaintiff personal questions, which made Plaintiff feel very uncomfortable.

115. Mr. Robert, and Mr. Pius were angry, and confused why Geller would not let Plaintiff leave.

116. When Mr. Pius approached Matthew Geller on behalf of Plaintiff, Geller told Pius that Plaintiff was being tortured based on her lawsuit, and graduate school.

117. Jackie Santiago, and Matthew Geller asked her questions tailored around her malpractice complaint against Suzanne Fico for Institutional racism, and graduate school.

118. When Plaintiff told the truth and answered that Plaintiff is (was) a graduate student which was also confirmed by Nina Anderson in the office of general counsel, and Plaintiff is (was) prosecuting a civil malpractice complaint on her own, they increased the drugs.

119. Nina Anderson in the office of the general counsel in no longer employed at Monmouth university.

120. This severe method of illegal torture was based on classical conditioning which is a psychological technique used for behavioral modification for the purpose to eventually trick the mind into believing something untrue, or controlling a behavior, through the induction of drugs, or a stimulus, in a controlled environment.

121. Plaintiff was brainwashed, felt very confused, felt raped, scared, in fear of further retaliation and losing her life, once she was able to figure out a way to get out of this.

122. If Plaintiff refused drugs, Matthew Geller instructed staff to restrain Plaintiff, and inject her body double the dose baseline, albeit Plaintiff has the right to refuse drugs in the State of New Jersey.

123. Plaintiff watched as Jackie Santiago, and Matthew Geller lied to the Judge Johnson under oath, and manipulated him in order to keep Plaintiff longer for when she was there based on Defendant Jodry's lies, and perjury.

124. Jackie Santiago deviously slid a copy of an email Plaintiff sent to Defendant Jodry noting the Plaintiff requesting for Defendant Jodry to "leave me alone" (Id).

125. Plaintiff saw the picture of her, with her niece (arm in arm), and her dog in their paperwork.

126. Plaintiff did not understand why there was a picture of her, with her niece, and her dog in their paperwork.

127. There is also reasonable suspicion Defendant Jodry, Jackie Santiago, Virginia Kenneman, and Maryanne Nagy know each other, all of which is illegal, and unethical in professional practice of psychology, medicine, nursing, and social work in the State of New Jersey.

128. Almost two weeks into Plaintiff's torture, Plaintiff found out Defendant Mitchell signed a complaint against her for harassment on behalf of Defendant Jodry.

129. Maryanne Nagy began making several harassing phone calls to Plaintiff's mother.

130. Plaintiff later found out from Jackie Santiago, that Defendant Jodry transferred her daughter into the same school district Plaintiff's mother worked for while she gloated to the class her daughter was home schooled.
131. After being tortured for about two weeks, Plaintiff found out from Jackie Santiago Defendant Mitchell charged the Plaintiff with harassment based on the crime Defendant Jodry committed against Plaintiff.
132. Defendant Mitchell admitted he charged Plaintiff with harassment based on Defendant Jodry's fraudulent claims, and through bias investigation that lacked merit, all of which resulted in Plaintiff's torture.
133. Nurses and other staff were angered about what happened to Plaintiff, and they were furious Defendant Geller would not release Plaintiff. They were angered Rafaniello stripped Plaintiff clothes off, restrained in a room full of men.
134. Plaintiff was tortured and brainwashed for over a month at Monmouth medical.
135. When Plaintiff refused for Amina to take her blood, Chowdhury transferred Plaintiff to Trenton, where she was tortured for another two months.
136. Once Plaintiff as able to figure out how to get out of this crime, she was terrified to go to Court to stand against Defendant Mitchell's fraudulent complaint, she was scared of police, and she was emotionally wrought, confused, and distressed.
137. On or about August 2015, Plaintiff went to Court to address Defendant Mitchell's complaint.
138. Plaintiff was holding back tears in the Courtroom.
139. When Plaintiff arrived, Defendant Jodry also showed up to Court.
140. Plaintiff was also told that lawyers from Monmouth university were also in the Courtroom.
141. On or about December 2015, upon review of Plaintiff's legal information, Defendant McElroy, Deutsch, Mulvaney&Carpenter (Plaintiff's adversary in the malpractice complaint against Suzanne Fico), where also retained by Monmouth university, Defendant Dimenna, and Defendant Jodry, sometime at the end of December 2014.
142. Neither Defendant Lipomanis, nor Defendant Periano disclosed this retainer to the Plaintiff.
143. Plaintiff retained a public defendant who told Plaintiff Defendant Mitchell did not have any information against Plaintiff, since Defendant Mitchell's complaint was based on Defendant Jodry's perjury, and lies.
144. Plaintiff's public defender told Plaintiff he will arrange it so Defendant Jodry, and Defendant Mitchell, were not there the next time she would have to show for Court.
145. Defendant Mitchell's complaint against Plaintiff was dismissed since malicious prosecution is illegal.

ILLEGAL IMMORAL AND UNETHICAL COVER-UP

146. On August 25th, 2015, Plaintiff contacted Monmouth County prosecutor's office to report the crime committed against her to Daniel Newman (hereinafter, "Newman"), and emailed case information related to this crime.
147. Plaintiff was sad and felt sick to her stomach for months since could not understand why any of this happened. She was perplexed why any individual representing credible channels could do something so hateful, sinister, deliberate, unethical, and illegal to anyone, in retaliation solely based on race.
148. Plaintiff was very nervous, and scared to interact with the people she was in touch with at Monmouth county prosecutor's office.

149. The investigation was forwarded to Jennifer Lipp (hereinafter, "Lipp") in the department of Integrity, and Responsibility, since she is responsible for conducting investigations when there is a complaint against an officer.

150. On September 10th, 2015, Lipp wrote a letter to Plaintiff indicating she closed the investigation against Defendant Mitchell.

151. On or about October 2015, Plaintiff spoke with Lipp at Monmouth County Prosecutor's Office regarding the letter and Plaintiff's complaint.

152. Lipp confirmed Defendant Mitchell conducted a bias investigation against Plaintiff, which resulted in her torture at Monmouth medical.

153. In the absence of Defendant Monmouth university addressing Plaintiff's true and correct complaints of harassment, stalking, and bullying against her, Defendant Jodry who is caucasian, simply went to Neptune city police, illegally committed perjury and libel slander to Defendant Mitchell, who is also caucasian, in a predominately caucasian County (where the detention of minorities is high).

154. Defendant Mitchell then conducted a bias investigation, approached the people harassing, and bullying her, and created a story to justify Defendant Jodry's false claims, in the absence of approaching Plaintiff and obtaining a factual account of what was going on, to get the true story, which concluded Defendant Mitchell's investigation.

155. Franca Mancini (Caucasian) at Monmouth university then illegally accessed and shared Plaintiff's information to Rafaniello (Caucasian) at Monmouth medical, which is illegal, and unethical in the practice of psychology, nursing, medicine, and social work.

156. Rafaniello illegally accepted it.

157. AnthonyTrachta at Monmouth medical illegally signed the paperwork.

158. Franca Mancini illegally accessed Plaintiff's information against and maliciously placed Plaintiff on 'leave of absence' while she was tortured from three months, and where Plaintiff was told, she is still a graduate student, just of leave of absence.

159. Upon information and account, Defendant Mitchell's attorney, and Neptune city police are claiming immunity for the department, and the officer since Defendant Jodry is the individual that committed perjury against the Plaintiff with the Plaintiff's family picture.

160. Upon information and knowledge, Lipp communicated that she closed the investigation against Defendant Mitchell to Edward Kirschenbaum, Mr. Trocchio, and Mr. Quigliano.

161. Plaintiff reproached the Prosecutor's office regarding investigating the white on black crime committed against her, and Lipp, Seely, Newman and Handler refused to reopen the complaint and prosecute the officer, Defendants Jodry, Lipomanis, and Periano.

162. Plaintiff reproached Defendant Kirschenbaum regarding the criminal investigation she has been trying to get investigated on the county level on her behalf.

163. On October 4th, 2015, Plaintiff emailed Ed Kirschenbaum, and Mr. Tocchio, and Newman, a new criminal complaint to be addressed at the municipality based on Defendant Jodry's perjury, implicating several people to the crime.

164. On or about October 5th, 2015, Kirschenbaum attempted to conspire and torture Plaintiff again in the spirit of properly having this crime addressed through the justice system.

165. Plaintiff still emotionally exhausted and scared filed a claim with the Victim of Crimes Compensation office, and was directed to Nancy Frankie (hereinafter, "Frankie").

166. Frankie indicated she would speak with "Danny", and "Stacey" regarding her complaint.

167. There is reason to believe there is nepotism between Frankie, and Newman, which has prejudiced Frankie's professional responsibility related to the ethical and lawful functioning in her position.

168. Stacey Handler, Lipp, and Jacquelynn Seeley (all Caucasian) refused to reopen and investigate the complaint based on the Plaintiff's statement of truth, and fact.

169. There is reasonable to believe there is nepotism among Lipp, Handler, and Seely, since none of these individuals have been properly terminated related to the Defendant's support of criminal activity, and white on black crime in Monmouth County.
170. Plaintiff rightfully sent ethics complaints to Joseph Casello against Charlene Diana, Handler, Lipp, Defendant Dimenna, Defendant Lipomanis, and Defendant Periano, since the individuals are all attorney's, all of which Joseph Casello refused to investigate, as the Secretary of District IX. Joseph Casello did write Plaintiff to let her know Plaintiff can sue those individuals if she felt 'harmed' in any way.
171. Monmouth County Prosecutor's Office, and McElroy, Mulvaney, Deutsch&Carpenter, LLP., Neptune City police, Keith Mitchell, and Joseph Casello have defaulted in this matter in Monmouth County Superior Court.
172. Plaintiff filed complaint with the VCCO on November 8th, 2016.
173. Michelle Williams was overseeing the VCCO claim.
174. There is reasonable suspicion Michelle Williams is not qualified to conduct proper investigations of this caliber of psychological and technological warfare based on white on black crime.
175. There is also reasonable suspicion Michelle Williams is African American.
176. Plaintiff received a call from Romona Peterson, Michelle William's supervision, after Plaintiff escalated this matter to Romona Peterson after she made several unreturned phone calls regarding her claim over the course of months to Michelle Williams since she strongly was in need of therapy.
177. On April 8th, 2016, Plaintiff received a phone call from Romona Peterson, indicating Michelle Williams denied Plaintiff's claim in the absence of Romona Peterson taking over the claims investigation.
178. There is reasonable suspicion Romona Peterson is not qualified to supervise or conduct proper investigations of this caliber of psychological and technological warfare based on white on black crime.
179. There is also reasonable suspicion Romona Peterson is African-American.
180. The VCCO is operating contrary to the state laws against time management, and waste in complaint resolution since Plaintiff filed, and is operating poorly since there should only be qualified people conducting all impartial crime investigations in the State of New Jersey.
181. There is reasonable suspicion that Michelle Williams, and Romona Peterson's denial of Plaintiff's claim is based on Frankie's attempt to sweep this wrongful and illegal white on black crime under the rug, instead of treating Plaintiff with the respect all Victims of Crime deserve in the State of New Jersey.
182. It is clear based on the content of this factual complaint, Plaintiff is victim of white on black crime.
183. Upon information and belief Monmouth County Prosecutor's Office, and the New Jersey Board of Bar Examiners, Neptune City Police, McElroy, Mulvaney, Deutsch&Carpenter, LLP., and Monmouth university prohibits professionals to practice and commit deliberate white collar bias crimes based on hate, libel, slander, and technological, and psychological warfare.
184. Upon information and belief Monmouth County Prosecutor's Office, and the New Jersey Board of Bar Examiners only condones the ethical and legal practice of credentialed attorney's entrusted to uphold the integrity within the justice system, and to properly support and nurture the right individuals with scruples all of whom are law abiding, whom properly function in their position respective to society and maintaining social order, and all of whom are devoid of any racial, and or ethnic preference, or prejudice.
185. Upon reason and belief, and since several people have either been terminated, or have stepped down since the inception of the white on black crime against Plaintiff, Defendants are making a deliberate attempt to sweep this crime under the rug.

186. Upon reason and belief, the purpose of the Essex County Victim of Crime compensation office is to restore the dignity and pride of crime victims regardless of race, pursue grievances in the absence of fear, and pay claims since it is funded through the through the Federal Government.

FIRST COUNT

Kidnapping (N.J.S.A 2C:13-1)

187. Plaintiff repeats the forgoing allegations as if fully set forth herein.
188. Plaintiff opposed, protested, and/or complained about practices and/or acts deemed unlawful through this statute, and law.
189. As a result, Plaintiff suffered severe irreparable harm and was damaged.

SECOND COUNT

Harassment (N.J.S.A. 2C:33-4)

190. Plaintiff repeats the foregoing allegations as if fully set forth herein.
191. Plaintiff opposed, protested, and/or complained about practices and/or acts that are illegal, and unlawful under the statures for harassment.
192. Defendants retaliated against Plaintiff based upon her opposition, protest, and/or complaining of practices and/or acts that are unlawful under the statues of harassment.
193. Plaintiff was subjected to retaliation at the time, or after, she opposed, protested, and complained about practices and/or acts that are illegal, and unlawful under statutes, and law.
194. Defendants retaliated against Plaintiff by ultimately kidnapping her.
195. Plaintiff's opposition, protest, and/or complaining of practices and/or acts that are unlawful under state law resulted in her kidnapping.
196. As a result, Plaintiff suffered severe irreparable harm and was damaged.

THIRD COUNT

Official Misconduct

(N.J.S.A 2C:30-2)

197. Plaintiff repeats the foregoing allegations as if fully set forth herein.
198. Plaintiff was illegally and wrongfully kidnapped based on libel slander, and malicious prosecution, from Monmouth university, for opposing, protesting, and/or complaining about practices and/or acts that are in violation of New Jersey State law, and policy.
199. Plaintiff was illegally kidnapped from Monmouth university and tortured for exercising rights protected by public policy, and law, including but not limited to opposing, protesting, and/or complaining about the practices and/or acts of Defendants.
200. Plaintiff knows Defendants were acting in violation of the public policy of the State of New Jersey.
201. Plaintiff took action to prevent against objectionable conduct.
202. Plaintiff sufficiently expressed her disagreement and concerns of Defendants' objectionable conduct to Monmouth County Prosecutor's Office.
203. As a result, Plaintiff suffered severe irreparable harm and was damaged.

FOURTH COUNT

Retaliation (N.J.S.A 2C:27-5)

204. Plaintiff repeats the foregoing allegations as if fully set forth herein.
205. Plaintiff was subjected to an intimidating, harassing, annoying, and fearful environment at Monmouth university.
206. Plaintiff would not have been subjected to this treatment if she was not a woman, and she was caucasian.

207. Defendant's actions were severely disgusting, sinister, pervasive, deliberate, abusive, and illegal.

208. Defendants' failed to take reasonable steps to stop, prevent, and/or cure harassment, or retaliation.

209. As a result, Plaintiff suffered severe irreparable harm and was damaged.

FIFTH COUNT

Discrimination in Violation of 42 U.S.C 1981

210. Plaintiff repeats and re-alleges the foregoing allegations as if fully set forth herein.

211.. 42 USC 1981 states in relevant part as follows:

(a) Statement of equal rights

All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

212. Defendants violated the above section by discriminating against Plaintiff, solely due to her race by retaliating against her for complaints of discrimination, and harassment.

213. As a result, Plaintiff suffered harm and was damaged.

SIXTH COUNT

Civil Action for deprivation of rights 42 U.S.C 1983

214. Plaintiff repeats and re-alleges the foregoing allegations as if fully set forth herein.

215. 2 USC 1983 states in relevant part as follows:

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

SEVENTH COUNT

Conspiracy to interfere with civil rights 42 U.S.C 1985(2)

216. Plaintiff repeats and re-alleges the foregoing allegations as if fully set forth herein.

217. 42USC 1985(2) states in relevant part as follows:

(2) Statement of conspiracy to interfere with civil rights

If two or more persons in any State or Territory conspire to deter, by force, intimidation, or threat, any party or witness in any court of the United States from attending such court, or from testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party or witness in his person or property on account of his having so attended or testified, or to influence the verdict, presentment, or indictment of any grand or petit juror in any such court, or to injure such juror in his person or property on account of any verdict, presentment, or indictment lawfully assented to by him, or of his being or having been such juror; or if two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws;

218. Defendants through its employees participated in unlawful, illegal, and discriminatory practices against Plaintiff.

219. Defendants are vicariously liable for the actions of its police officers, administrators, directors, detectives, leaders, teachers, supervisors, and managers.

220. As a result, Plaintiff suffered irreparable harm and was damaged.

EIGHTH COUNT

Action for Neglect 42 U.S.C 1986

221. Plaintiff repeats and re-alleges the foregoing allegations as if fully set forth herein.

222. 42USC 1986 states in relevant part as follows:

Every person who, having knowledge that any of the wrongs conspired to be done, and mentioned in section 1985 of this title, are about to be committed, and having power to prevent or aid in preventing the commission of the same, neglects or refuses so to do, if such wrongful act be committed, shall be liable to the party injured, or his legal representatives, for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented; and such damages may be recovered in an action on the case; and any number of persons guilty of such wrongful neglect or refusal may be joined as defendants in the action

223. Defendants through its employees participated in unlawful, illegal, and discriminatory practices against Plaintiff.

224. Defendants are vicariously liable for the actions of its police officers, administrators, directors, detectives, leaders, teachers, supervisors, and managers.

225. As a result, Plaintiff suffered irreparable harm and was damaged.

NINTH COUNT

Prosecution of violation of certain laws 42 U.S.C 1987

226. Plaintiff repeats and re-alleges the foregoing allegations as if fully set forth herein.

227. 42USC 1987 states in relevant part as follows:

The United States attorneys, marshals, and deputy marshals, the United States magistrate judges appointed by the district and territorial courts, with power to arrest, imprison, or bail offenders, and every other officer who is especially empowered by the President, are authorized and required, at the expense of the United States, to institute prosecutions against all persons violating any of the provisions of section 1990 of this title or of sections 5506 to 5516 and 5518 to 5532 of the Revised Statutes, and to cause such persons to be arrested, and imprisoned or bailed, for trial before the court of the United States or the territorial court having cognizance of the offense.

PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully requests this Court to grant the following relief:

A. A declaratory judgment that Defendants engaged in illegal, and unlawful practices, in violation of New Jersey state law, and statute;
B. An injunction against Defendants and their officers, agents, successors, employees, representatives and any and all persons acting in concert with them as provided by law, from engaging in each of the illegal and the unlawful practices, policies, and patterns set forth herein;

C. Award damages to Plaintiff for all lost wages, educational related expense, pain and suffering, resulting from Defendants' illegal and unlawful discrimination, retaliation, kidnapping, misconduct, and harassment, and to otherwise make her whole for any and all loss suffered as a result of those grotesque illegal practices;
D. Award Plaintiff compensatory damages;
E. Award Plaintiff punitive damages;
F. Award Plaintiff economic loss;
G. An award of statutory penalties, and prejudgment and post judgment interests;
H. The erasure, removal, and the expunge all private and public records and information related to the foregoing against Plaintiff;
I. Such other further relief as this Court deems just and proper.

Jacquelyn Reaves

Jacquelyn Reaves, Pro Se

CERTIFICATION

I, JACQUELYN REAVES, declare as follows:

I am the individual Plaintiff in the above-entitled matter, and I am fully aware of the stated facts on this complaint.

I have served a copy of this complaint to the defendants on this complaint.

Additionally, I have read the foregoing Certified Complaint and state the contents are true to the best of my knowledge. I understand I am subject to penalty if the foregoing statements are willfully false.

Dated: May 31st, 2016

Jacquelyn Reaves

Jacquelyn Reaves